

11/18/24  
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POOR QUALITY ORIGINAL

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

Elizabeth Nelson  
PO Box 1422  
WARREN MI 48090  
Et al

Case No. 2:23-cv-11597

Plaintiff

Judge McMillion

-vs-

Magistrate: Ivy Jr

ROBERT SCOTT

FILED  
AUG - 9 2024  
CLERK'S OFFICE  
DETROIT

Et al.,

Defendants

MOTION FOR 30 DAY EXTENSION OF DISCOVERY TO HAVE DEFENDANTS STI TOWING RESPOND TO DISCOVERY FOR "GOOD CAUSE" SHOWN, AND (D) CITY OF WARREN PRODUCE 911 TAPE, TRANSCRIPT, CONSOLIDATED WITH MOTION TO COMPEL (D) STI TOWING, ABLE TOWING LLC, (Ds') DENNIS, SANDRA, BRUCE HERTZ, AKA HERTZ BROS. & EMPLOYEE RANDY SULLIVAN TO ANSWER ADMISSIONS UNDER OATH BY DEFENDANTS INSTEAD JUST SIGNED BY ATTORNEY INSTANTER\*

(Ps') move for 30-day extension for discovery as (Ds') STI Towing, Hetz Bros et al., and the City of Warren have produced no discovery despite being requested "E. DISCOVERY All discovery must be initiated such that it is completed by the deadlines indicated herein. Fact discovery must be completed by August 5, 2024. Extensions of court-

supervised discovery are not ordinarily granted in the absence of unusual circumstances. That said, a party may move to extend scheduling order deadlines addressing Fed. R. Civ. P. 16(b) good cause factors. All motions to compel disputed discovery or for protective orders must be filed promptly (within 14 days) of notice of the dispute or they will not be considered, absent an extraordinary showing of good cause. Prior to filing a motion to compel, the moving party must seek concurrence in the relief sought and certify attempts to do so under Local Rule 7.1."

The current discovery cutoff date is 8/5/24. Per Ex A, (D) STI Towing Inc., Able Towing LLC, defendants Dennis Hertz, Randy Sullivan, Sandra Hertz, responded to ADMISSIONS Ex B Sandra Hertz, Ex C, Dennis Hertz, Ex D, Bruce Hertz, Ex E, Randy Sullivan REQUEST FOR ADMISSIONS. The ADMISSIONS were sent 7/4/24 per Ex F with tracking 9400136105536412872403, but not received by (D) counsel until 7/15/24 per Ex G: USPS tracking.

Per Ex A, (Ds') response same was to be answered by defendants Dennis Hertz, Bruce Hertz, Sandra Hertz, Randy Sullivan under oath rather than their attorney. The response to totally inadequate and not responded to under oath by the defendant. For this reason (Ps') asks for a 30-day extension for STI towing defendants to compel response to ADMISSION

*Per Nicholson v. Gulino*, Civ. No. 19-446 KWR/KK (D.N.M. Nov. 24, 2020)

Federal Rule of Civil Procedure 33 provides that "[e]ach interrogatory must, to the extent it is not objected to, be answered separately and fully in writing under oath." Fed. R. Civ. P. 33(b)(1)(3). While Rule 33 requires interrogatory answers to be made "under oath," it "does not prescribe any particular form of verification." *Richard*, 332 F.R.D. at 458 (quoting *Zanowic v. Reno*, No. 97-5292 JGK/HBP, 2000 WL 1376251, at \*5 (S.D.N.Y. Sept. 25, 2000)). "In other words, there is more than one way to satisfy the requirement that interrogatory responses be made under oath." *Id.* at 457 (citation omitted). For example, in lieu of signing a sworn verification, a party may submit a declaration that complies with the requirements of 28 U.S.C. § 1746. *Id.*; see, e.g., *In re World Trade Ctr. Disaster Site Litig.*, 722 F.3d 483, 487-488 (2d Cir. 2013) (applying Section 1746 to interrogatory answers); *United States v. That Certain Real Prop. Located at 632-636 Ninth Ave., Calera, Ala.*, 798 F. Supp. 1540, 1547 (N.D. Ala. 1992) (same).

Section 1746 provides that where any matter is required or permitted to be supported, evidenced, established, or proved by the sworn declaration, verification, certificate, statement, oath, or affidavit ... such matter may, with like force and effect, be supported, evidenced, established, or proved by the unsworn declaration, certificate, verification, or statement ... in writing of such person which is subscribed by him, as true under penalty of perjury, and dated, in substantially

the following form:..."I declare (or certify, verify, or state) under penalty of perjury that the foregoing is true and correct. Executed on (date) (Signature)."

28 U.S.C. § 1746. However, the Court will direct Defendant, at his option, to either: (a) swear to his interrogatory answers in a manner that fulfills Rule 33's "under oath" requirement, such as by signing a sworn verification; or, (b) submit an unsworn verification that declares under penalty of perjury that his answers are true and correct"

Further, (Ps') served (D) city of Warren discovery request for 911 tape on morning of 7/8/21 (P) Thrower made when being "assault & battery",

"kidnapped" by (D) Scott.

(D) city of Warren MI has not responded to this request for discovery as of this filing for the 911 transcript from city of Warren dispatcher. A copy of that motion for discovery is annexed hereto as Ex H.

\* Per Ex I Tornado hit Cleveland, NE OHIO 8/6/24 knocking out power till 8/14/24 per electric company. (Ps') without electric since then

WHEREFORE, (Ps') pray for a 30-day extension to complete discovery consolidated with a MOTION TO COMPEL (Ds') Hertz Bros., Sandra Hertz and Randy Sullivan to answer the ADMISSIONS under oath and to produce the requested receipts for towed vehicles.

Respectfully submitted,

  
Albert Thrower pro'se

  
Elizabeth Nelson pro'se

#### CERTIFICATE OF SERVICE

A copy of this motion has been served on the (Ds') at their respective addresses infra this 8/9/24

#### CERTIFICATE OF SERVICE

A copy of this motion has been served on the below defendants after calling same to see if they agree with (Ps') position this 12/15/23

Mark Straetmans/ Rachel Selina 255 E Brown St #320 Birmingham, MI 48009 tel 2486459680

[mstraetmans@berrymoorman.com](mailto:mstraetmans@berrymoorman.com)

[rselina@berrymoorman.com](mailto:rselina@berrymoorman.com)

Jenifer Mead PO Box 806042 St Clair Shores, MI 48080 tel 3134851250

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[Tsstidham@hotmail.com](mailto:Tsstidham@hotmail.com)

  
Albert Thrower pro se

  
Elizabeth Nelson pro se

1

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

ELIZABETH NELSON and ALBERT THROWER, Case No. 2:23-cv-11597  
Hon. Brandy R. McMillion  
Mag. Judge Curtis Ivy, Jr.

Plaintiffs,

-v-

ROBERT SCOTT JOHN DOE PROPERTY  
MAINTENANCE DIVISION SUPERVISOR),  
SERVICE TOWING, INC., *ET AL.*

Defendants.

Jennifer Nelson  
P.O. Box 1422  
Warren, MI 48090  
In Pro Per

Albert Thrower  
P.O. Box 6702  
Cleveland, OH 44101  
In Pro Per

Jennifer Mead (P57106)  
P.O. Box 806042  
St. Clair Shores, MI 48080  
(313) 485-1250  
Attorney for Service Towing, Inc.  
meadjenn@hotmail.com  
Thomas Stidham (P56504)  
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Detroit, MI 48244  
(248) 303-0306  
Co-Counsel for Service Towing, Inc.  
Defendants

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Mark E. Straetmans (P29158)  
Rachel C. Selina (P85430)  
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Birmingham, MI 48009  
(248) 645-9680  
Attorneys for City of Warren  
Defendants

Tracey L. Selina (P29158)  
meadjenn@hotmail.com

Ex A

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**SERVICE TOWING, INC. DEFENDANTS**  
**ANSWER TO PLAINTIFFS' REQUESTS FOR ADMISSION**

**NOW COME** Defendants SERVICE TOWING, INC., ABLE TOWING, LLC, DENNIS HERTZ, BRUCE HERTZ, SANDRA HERTZ, RANDY SULLIVAN and EDWARD HERTZ (collectively herein the "Service Towing Defendants" unless identified otherwise), by and through undersigned counsel, pursuant to Fed.R.Civ.P. 36, and hereby respond to Plaintiffs' Requests For Admissions contained within its Interrogatories And Request For Production Of Documents as follows:

3) ~~ADMIT/DENY~~ the employee RANDY SULLIVAN or BRUCE HERTZ, OR DENNIS HERTZ identified in question 2 deliberately stalled (P) Thrower while (D) Scott was notified (P) Thrower was at the (D) STI tow yard ON OR ABOUT 7/8/21.

RESPONSE: Denied for the reason same is untrue.

5) ~~ADMIT/DENY~~ There was an agreement between Randy Sullivan &/or Bruce Hertz &/or Sandra Hertz &/or Dennis Hertz to call (D) Robert Scott when (P) Thrower appeared at the (D) STI Tow Yard facility to retrieve his vehicles that were towed 7/7/21 by (D) STI Towing LLC.

RESPONSE: The STI Defendants object to this Request as it contains allegations that are not factually true and inaccurate: the vehicles were not owned by Plaintiff Thrower and were not "his" to retrieve and STI is not a limited liability company. Subject to and without waiving said

objections, the Request is **denied** for the reason that the Request is untrue, as there was no agreement.

7) Randy Sullivan &/or Bruce Hertz &/or Dennis Hertz witnessed (D) Scott attacked (P) Thrower inside the (D) STI garage on or about 7/8/21.

RESPONSE: This statement is incomplete and if it was intended to be a Request For Admission, Fed.R.Civ.P. 36 requires it be in the required format. The STI Defendants object as a result of the statement's deficiencies and failure to comply with the mandates of the Rule 36 and therefore, no response is required. Subject to and without waiving said objections, had No. 7 intended by Plaintiff Thrower to constitute a proper Request For Admission, Defendants would deny same as untrue as there was no attack of Thrower.

8) ADMIT/DENY Randy Sullivan &/or Bruce Hertz, &/or Dennis Hertz witnessed (D) Robert Scott perform a "citizens arrest" inside the garage at (D) STI LLC tow yard garage on (P) Thrower on or about 7/8/21.

RESPONSE: Denied as untrue, as Mr. Scott did not make an "arrest".

Respectfully submitted,

/s/ ThomasStidham  
Thomas H. Stidham (P56504)  
Jennifer Mead (P57106)  
Co-Counsel for Service Towing, Inc.  
Defendants

Dated: July 30, 2024

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

Elizabeth Nelson  
PO Box 1422  
WARREN MI 48090  
Et al

Case No. 2:23-cv-11597

Plaintiff

Judge McMillion

-vs-

Magistrate: Ivy Jr

ROBERT SCOTT

Et al.,

Defendants

REQUEST FOR ADMISSIONS (D) SANDRA HERTZ

Pursuant to Rule 36, Fed. R. Civ. P. plaintiffs requests the defendant SANDRA HERTZ to make following admissions within 30 days after service of this request under oath.

1) (D)=Defendant SANDRA HERTZ had an agreement with (D) Robert Scott to

call or contact (D) Scott when (P) Thrower appeared at (D) STI =SERVICE

EX B



TOWING INC Tow yard to retrieve 2011 Silverado on or about 7/8/21?

ADMIT/DENY

2) Admit/Deny (D) SANDRA HERTZ towed at least one of two cars from 7568

Hudson Ave Warren MI on or about 7/7/21

3) Admit/Deny (D) SANDRA HERTZ heard (D) Scott say to “tow Honda from

behind the house” when cars were being towed from 7568 Hudson Ave Warren

MI 48091

4) Admit/Deny Honda Civic was parked at an angle behind the 7568 Hudson Ave

Warren MI house 7/7/21 when HONDA was towed

5) Admit/Deny SANDRA HERTZ said “the Honda cannot be towed without

damaging it” when cars were being from 7568 Hudson Ave Warren MI

6) Admit/Deny Towing a car from the rear parked at an angle could damage the

vehicle :

7) Admit/Deny Scott called STI Towing to tow the cars at 7568 Hudson Ave

Warren MI the morning of 7/7/21

8) Admit/Deny Honda was parked on concrete at 7568 Hudson Ave Warren MI

48091

9) Admit/Deny SANDRA HERTZ walked Thrower around the back of the

SERVICE TOWING INC. tow yard looking for 2011 White Silverado on or

about 7/8/21

10) Admit/Deny SANDRA HERTZ was told to stall THROWER in the back of

Service Towing Tow yard on or about 7/8/21 when THROWER came to pick up

cars

11) Admit/Deny Service Towing Inc is bound by US Supreme Court cases

when towing case and entering private property at the request of public officials

- 12) Admit/Deny -SANDRA HERTZ had an agreement with ROBERT SCOTT to call ROBERT SCOTT when (P) Thrower appeared at Service Towing Inc to release his vehicles on or about 7/8/21
- 13) Admit/Deny SANDRA HERTZ walked (P) Thrower around the tow yard when Thrower came to retrieve his vehicle on or about 7/8/21.
- 14) If SANDRA HERTZ -para 13- did not walk (P) Thrower around the tow yard 7/8/21-- the day THROWER was arrested at tow yard, who did?
- 15) Who called ROBERT SCOTT when (P) Thrower came to pick up his 2 vehicles on or about 7/8/21?
- 16) ADMIT/DENY SANDRA Hertz witnessed ROBERT SCOTT do a citizen's arrest on THROWER in the Service Towing Inc. garage 7/8/21
- 17) ADMIT/DENY ROBERT SCOTT came to Service Towing Inc., and did a citizen's arrest on THROWER in Service Towing Inc garage on or about 7/8/21
- 18) Admit/DENY both HONDA AND SILVERADO towed cars were operable when towed as they were driven off the STI TOW YARD LOT

- 19) Admit/Deny Honda and Silverado were driven off the STI TOW YARD facility after released
- 20) ADMIT/DENY There was an agreement to call ROBERT SCOTT when THROWER appeared to pick up his cars from STI TOWING

SANDRA Hertz

Per 28 USC Section 1746 "I declare (or certify, verify, or state) under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on / /2024.

SANDRA Hertz

CERTIFICATE OF SERVICE

A copy of this motion has been served on the below defendants after calling same to see if they agree with (Ps') position this 6/22/24

Mark Straetmans/Rachel Selina 255 E Brown St #320 Birmingham, MI 48009 tel 2486459680

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[rselina@berrymoorman.com](mailto:rselina@berrymoorman.com)

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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

Elizabeth Nelson  
PO Box 1422  
WARREN MI 48090  
Et al

Case No. 2:23-cv-11597

Plaintiff

Judge McMillion

-VS-

Magistrate: Ivy Jr

ROBERT SCOTT

Et al.,

Defendants

REQUEST FOR ADMISSIONS (D) DENNIS HERTZ

Pursuant to Rule 36, Fed. R. Civ. P. plaintiffs requests the defendant DENNIS HERTZ to make following admissions within 30 days after service of this request under oath.

1) (D)=Defendant DENNIS HERTZ had an agreement with (D) Robert Scott to

call or contact (D) Scott when (P) Thrower appeared at (D) STI =SERVICE

TOWING INC Tow yard to retrieve 2011 Silverado on or about 7/8/21?

ADMIT/DENY

EX C

2) Admit/Deny (D) DENNIS HERTZ towed at least one of two cars from 7568

Hudson Ave Warren MI on or about 7/7/21

3) Admit/Deny (D) DENNIS HERTZ heard (D) Scott say to “tow Honda from

behind the house” when cars were being towed from 7568 Hudson Ave Warren

MI 48091

4) Admit/Deny Honda Civic was parked at an angle behind the 7568 Hudson Ave

Warren MI house 7/7/21 when HONDA was towed

5) Admit/Deny DENNIS HERTZ said “the Honda cannot be towed without

damaging it” when cars were being from 7568 Hudson Ave Warren MI

6) Admit/Deny Towing a car from the rear parked at an angle could damage the

vehicle

7) Admit/Deny Robert Scott called STI Towing to tow the cars at 7568 Hudson

Ave Warren MI the morning of 7/7/21

8) Admit/Deny Honda was parked on concrete at 7568 Hudson Ave Warren MI

48091

9) Admit/Deny DENNIS HERTZ walked Thrower around the back of the

SERVICE TOWING INC. tow yard looking for 2011 White Silverado on or

about 7/8/21

10) Admit/Deny DENNIS HERTZ was told to stall THROWER in the back of

Service Towing Tow yard on or about 7/8/21 when THROWER came to pick up

cars

11) Admit/Deny Service Towing Inc is bound by US Supreme Court cases

when towing case and entering private property at the request of public officials

12) Admit/Deny-Dennis HERTZ had an agreement with ROBERT SCOTT to

call ROBERT SCOTT when (P) Thrower appeared at Service Towing Inc to

release his vehicles on or about 7/8/21

13) Admit/Deny Dennis HERTZ walked (P) Thrower around the tow yard when

Thrower came to retrieve his vehicle on or about 7/8/21.

14) If DENNIS HERTZ -para 13- did not walk (P) Thrower around the tow

yard 7/8/21-- the day THROWER was arrested at tow yard, who did?

15) Who called ROBERT SCOTT when (P) Thrower came to pick up his 2

vehicles on or about 7/8/21?

16) ADMIT/DENY Dennis Hertz witnessed ROBERT SCOTT do a citizen's

arrest on THROWER in the Service Towing Inc. garage 7/8/21

17) ADMIT/DENY ROBERT SCOTT came to Service Towing Inc., and did a

citizen's arrest on THROWER in Service Towing Inc garage on or about 7/8/21

18) Admit/DENY both HONDA AND SILVERADO towed cars were operable

when towed as they were driven off the STI TOW YARD LOT

19) Admit/Deny Honda and Silverado were driven off the STI TOW YARD

facility after released

20) ADMIT/DENY There was an agreement to call ROBERT SCOTT when

THROWER appeared to pickup his cars from STI TOWING

Dennis Hertz



Per 28 USC Section 1746 "I declare (or certify, verify, or state) under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on / /2024.

Dennis Hertz

#### CERTIFICATE OF SERVICE

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Mark Straetmans/ Rachel Selina 255 E Brown St #320 Birmingham, MI 48009 tel 2486459680

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Albert Thrower ,pro se Elizabeth Nelson pro se

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

**Elizabeth Nelson  
PO Box 1422  
WARREN MI 48090  
Et al**

**Case No. 2:23-cv-11597**

**Plaintiff**

**Judge McMillion**

**-vs-**

**Magistrate: Ivy Jr**

**ROBERT SCOTT**

**Et al.,**

**Defendants**

**REQUEST FOR ADMISSIONS (D) BRUCE HERTZ**

**Pursuant to Rule 36, Fed. R. Civ. P. plaintiffs requests the defendants to make following admissions within 30 days after service of this request under oath.**

**1) (D)=Defendant BRUCE HERTZ had an agreement with (D) Robert Scott to**

**call or contact (D) Scott when (P) Thrower appeared at (D) STI Tow yard to**

**retrieve 2011 Silverado on or about 7/8/21? ADMIT/DENY**

**EX B**

- 2) Admit/Deny (D) BRUCE HERTZ towed at least one of two cars from 7568

Hudson Ave Warren MI on or about 7/7/21

- 3) Admit/Deny (D) BRUCE HERTZ heard (D) Scott say to “tow Honda from

behind the house” when cars were being towed from 7568 Hudson Ave Warren

MI 48091

- 4) Admit/Deny Honda Civic was parked at an angle behind the 7568 Hudson Ave

Warren MI house 7/7/21 when HONDA was towed

- 5) Admit/Deny BRUCE HERTZ said “the Honda cannot be towed without

damaging it” when cars were being from 7568 Hudson Ave Warren MI 7/7/21

- 6) Admit/Deny Towing a car from the rear parked at an angle could damage the

vehicle

- 7) Admit/Deny Robert Scott called STI Towing to tow the cars at 7568 Hudson

Ave Warren MI the morning of 7/7/21

8) Admit/Deny Honda was parked on concrete at 7568 Hudson Ave Warren MI

48091

9) Admit/Deny BRUCE HERTZ walked Thrower around the back of the

SERVICE TOWING INC. tow yard looking for 2011 White Silverado on or

about 7/8/21

10) Admit/Deny BRUCE HERTZ was told to stall THROWER in the back of

Service Towing Inc Tow yard 7/8/21 when THROWER came to pick up cars

11) Admit/Deny Service Towing Inc is bound by US Supreme Court cases

when towing case and entering private property at the request of public officials

12) Admit/Deny -BRUCE HERTZ had an agreement with ROBERT SCOTT to

call ROBERT SCOTT when (P) Thrower appeared at Service Towing Inc to

release his vehicles on or about 7/8/21

13) Admit/Deny BRUCE HERTZ walked (P) Thrower around the tow yard

when Thrower came to retrieve his vehicle on or about 7/8/21.

14) If BRUCE HERTZ -para 13- did not walk (P) Thrower around the tow yard

7/8/21-- the day THROWER was arrested at tow yard, who did

15) Who called ROBERT SCOTT when (P) Thrower came to pick up his 2

vehicles on or about 7/8/21?

16) BRUCE Hertz witnessed ROBERT SCOTT do a citizen's arrest on

THROWER in the Service Towing Inc. garage 7/8/21

17) ADMIT/DENY ROBERT SCOTT came to Service Towing Inc., and did a

citizen's arrest on THROWER in Service Towing Inc garage

18) Admit/DENY both HONDA AND SILVERADO towed cars were operable

when towed as they were driven off the STI TOW YARD LOT when retrieved

19) Admit/Deny Honda and Silverado were driven off the STI TOW YARD

facility after released

20) There was an agreement with ROBERT SCOTT to call him when

THROWER arrived to pickup cars ADMIT/DENY

BRUCE Hertz

Per 28 USC Section 1746 "I declare (or certify, verify, or state) under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on / /2024.

BRUCE Hertz

**CERTIFICATE OF SERVICE**

A copy of this motion has been served on the below defendants after calling same to see if they agree with (Ps') position this 6/22/24

Mark Straetmans/ Rachel Selina 255 E Brown St #320 Birmingham, MI 48009 tel 2486459680

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-vs-

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ROBERT SCOTT

Et al.,

Defendants

REQUEST FOR ADMISSIONS (D) RANDY SULLIVAN

Pursuant to Rule 36, Fed. R. Civ. P. plaintiffs requests the defendants to make following admissions within 30 days after service of this request under oath.  
ADMISSIONS OF RANDY SULLIVAN

1) (D)=Defendants Randy Sullivan, had an agreement with (D) Robert Scott to

call or contact (D) Scott when (P) Thrower appeared at (D) STI=SERVICE

TOWING INC Tow yard to retrieve vehicles on or about 7/8/21

ADMIT/DENY

EX E

2) Admit/Deny (D) Randy Sullivan towed ONE OF two cars from 7568 Hudson Ave Warren MI on or about 7/7/21

3) Admit/Deny (D) Randy Sullivan heard (D) Scott say "tow Honda from behind the house" when cars were being towed from 7568 Hudson Ave Warren MI 48091

4) Admit/Deny Honda Civic was parked at an angle behind the 7568 Hudson Ave Warren MI house 7/7/21 when HONDA was towed

5) Admit/Deny Randy Sullivan said "the Honda cannot be towed without damaging it" when cars were being from 7568 Hudson Ave Warren MI ON OR ABOUT 7/7/21

6) Admit/Deny Towing a car from the rear parked at an angle could damage the vehicle

7) Admit/Deny Robert Scott called STI Towing to tow the cars the morning of 7/7/21 from 7568 Hudson Ave Warren MI



8) Admit/Deny Honda was parked on concrete at 7568 Hudson Ave Warren MI 48091

9) Admit/Deny Service Towing Inc are bound by US Supreme Court cases when towing case and entering private property at the request of public officials

10) Admit/Deny-Randy Sullivan had an agreement with ROBERT SCOTT to call ROBERT SCOTT when (P) Thrower appeared at Service Towing Inc to release his vehicles on or about 7/8/21

11) Admit/Deny RANDY SULLIVAN walked Thrower around the back of the SERVICE TOWING INC. tow yard looking for 2011 White Silverado on or about 7/8/21

12) Admit/Deny RANDY SULLIVAN was told to stall THROWER in the back of Service Towing Inc tow yard lot on or about 7/8/21

13) If Randy Sullivan -para 12- did not walk (P) Thrower around the tow yard

7/8/21-looking for his 2011 TOWED SILVERADO- the day THROWER was  
arrested at tow yard-WHO DID?

14) Who called ROBERT SCOTT when (P) Thrower came to pick up his 2  
vehicles on or about 7/8/21?

15) Randy Sullivan witnessed ROBERT SCOTT do a citizen's arrest on  
THROWER in the Service Towing Inc. garage 7/8/21 ADMIT/DENY

16) ADMIT/DENY ROBERT SCOTT came to Service Towing Inc., and did a  
citizen's arrest on THROWER in Service Towing Inc garage on or about  
7/8/21

17) Admit/DENY both HONDA AND SILVERADO towed cars were operable  
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19) There was an agreement with ROBERT SCOTT to call him when  
THROWER arrived to pick up cars ADMIT/DENY

20)

RANDY SULLIVAN

Per 28 USC Section 1746 "I declare (or certify, verify, or state) under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on     /     /2024.

RANDY SULLIVAN

CERTIFICATE OF SERVICE

A copy of this motion has been served on the below defendants after calling same to see if they agree with (Ps') position this 6/22/24

Mark Straetmans/Rachel Selina 255 E Brown St #320 Birmingham, MI 48009 tel 2486459680

[mstraetmans@berrymoorman.com](mailto:mstraetmans@berrymoorman.com)

[rselina@berrymoorman.com](mailto:rselina@berrymoorman.com)

Jenifer Mead PO Box 806042 St Clair Shores, MI 48080 tel 3134851250

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Law Offices of Thomas H. Stidham. 1401 W Fort St. Rm 1006. Detroit, MI 48233. Telephone: (248) 303-0306. Fax: (313) 832-7661.

[Tsstidham@hotmail.com](mailto:Tsstidham@hotmail.com)

Albert Thrower ,pro se Elizabeth Nelson pro se

Your email address (stanthonymonastery@gmail.com) has not been verified yet!

[Send Verification Link](#)

Thursday, 7/4/24 3:21 PM EDT

## LAW OFFICES T H STIDHAM

44-1815  
1401 W Fort St  
Detroit MI 48244-3501

**Shipment Details** 9400136105536412872403

**Ship From Address:** warren po  
ABERT THROWER/ELIZABETH  
NELSON  
PO Box 1422  
Warren MI 48090-1422

**Package Details:** 8 oz  
**Package Type:** Envelope, Padded  
Envelope, Poly Bag, Soft Pack, or  
Box in a Bag  
**Dimensions:** 9x8"  
**Weight:** 8 oz  
**Free Online Delivery Confirmation**

**Label Details**  
**Label Size:** 4x6"  
**Label Filetype:** PDF

Service	Cost
Ground Advantage, Zone 1	\$4.21
<b>Total Cost</b>	<b>\$4.21</b>
<b>Ship Date</b>	Thursday, 7/4/24
<b>Email Recipients (EDT)</b>	No Email Address set

EX F

ALERT: FLOODING AND SEVERE WEATHER IN THE SOUTHEAST U.S. MAY IMPACT DELIVERY. ...

# USPS Tracking<sup>®</sup>

FAQs >

Tracking Number:

Remove X

## 9400136105536412872403

Copy

Add to Informed Delivery (<https://informedelivery.usps.com/>)

### Latest Update

Your item has been delivered and is available at a PO Box at 6:15 pm on July 15, 2024 in DETROIT, MI 48244.

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USPS Tracking Plus<sup>®</sup>

### Delivered

Delivered, PO Box

DETROIT, MI 48244

July 15, 2024, 6:15 pm

See All Tracking History

(<https://faq.usps.com/s/article/Where-is-my-package>)

Text & Email Updates



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EX G

Track Another Package

Feedback

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

ELIZABETH NELSON, et al.,

Case No. 2:23-cv-11597  
Hon. Brandy R. McMillion  
Plaintiffs, Mag. Judge Curtis Ivy, Jr.

-v-

ROBERT SCOTT  
(city of Warren MAINTENANCE DIVISION SUPERVISOR),  
SERVICE TOWING, INC., ABLE TOWING, LLC,  
Et al., Defendants.

NOW COME plaintiff's NELSON, THROWER, pursuant to Fed.R.Civ.P. 34 (Ps')  
requests that (Ds') City of Warren produce the infra documents within 30 days:

- 1) The name and a copy of the 911 tape where (P) Thrower called 7/8/21 @  
approximately 9:40 AM reporting kidnapping, assault and battery in  
progress by (D) Robert Scott @ Service Towing Inc.
- 2) Name of all (D) Warren police officers that arrested (P) Thrower 7/8/21 at  
Service Towing Inc., tow yard

7/29/2024

Albert Thrower/ Elizabeth Nelson pro se

CERTIFICATE OF SERVICE

A copy of this motion has been served on the attorney for (D) city of Warren and  
Scott this 7/29/24 US mail postage prepaid with tracking

A Thrower E Nelson

H  
EX

## Crews Working 24/7 to Restore Power to FirstEnergy Customers Following Severe Thunderstorms

High winds, heavy rain cause power outages for nearly 578,000 FirstEnergy customers



AKRON, Ohio, Aug. 7, 2024 – Power has been restored to more than 230,000 of the approximately 578,000 FirstEnergy Corp. (NYSE: FE) customers who lost service due to severe storms that swept across northeast Ohio, Pennsylvania and New Jersey on Monday. With help from more than 4,100 additional line workers and field personnel from contractors and mutual assistance organizations, FirstEnergy's electric company personnel will continue to work around the clock in 16-hour shifts to make repairs as quickly and safely as possible.

The powerful storm system brought strong winds exceeding 75 mph in parts of Ohio and western Pennsylvania, along with rainfall exceeding two inches in parts of eastern Pennsylvania and New Jersey. Northeast Ohio was the hardest hit area, with more than 333,000 out across Ashtabula, Cuyahoga, Geauga, Lake and Lorain counties.

The tree- and flood-related damage is widespread, causing hundreds of broken poles and crossarms, downed power lines, and fallen trees and debris blocking road access. Our primary focus at this stage is to remove any hazards and assess the damage so that crews can access the site of an outage and begin to safely make the repairs. Due to the extent of damage, restoration work is expected to continue over the next few days, particularly in Ohio.

Customers should assume all downed or low-hanging power lines are energized and dangerous. Stay at least 30 feet away and use extra caution where downed lines are tangled in trees or other debris. Report downed lines ASAP by calling 911.

All internal line crews, hazard responders, forestry crews, contractors, safety and other support personnel are involved in storm response, and significant additional outside resources have been secured to assist with the restoration effort. Though downed trees, localized flooding and road closures can slow progress, crews will continue to work around the clock to safely make repairs and ensure service to all customers has been restored.

Current outage updates as of 10 a.m. today include:

- **The Illuminating Company:** Approximately 338,200 customers in northeast Ohio lost power due to the storms, and 306,000 customers remain without service, primarily in the hardest-hit areas of Cuyahoga and Lake counties. Restoration times will be established as soon as possible as damage assessment progresses.
- **Ohio Edison:** Approximately 97,400 customers in northern and eastern Ohio lost power due to the storm, and 28,500 remain without service. Restoration times will be established as soon as possible as damage assessment progresses.
- **Penn Power:** Approximately 17,800 customers in western Pennsylvania lost power due to the storm, and 5,200 remain without service. The hardest-hit area was Mercer County. The majority of customers are expected to have power restored by 11 p.m. tomorrow.
- **West Penn Power:** Approximately 16,200 customers in western Pennsylvania lost power due to the storm, and approximately 1,500 remain without service. The majority of customers are expected to have power restored by 11 p.m. tonight.
- **Penelec:** Approximately 12,600 customers in northern and central Pennsylvania lost power due to the storm, and about 245 remain without service. The remaining customers are expected to have power restored by 8 p.m. tonight.
- **Met-Ed:** Approximately 15,200 customers in eastern Pennsylvania lost power due to the storm, and 3,500 remain without service. The majority of customers are expected to have power restored by 11 p.m. tonight.
- **JCP&L:** Approximately 44,700 customers in New Jersey lost power due to the storm, and about 3,800 remain without service. The majority of customers are expected to have power restored by 11 p.m. tonight.

### How to Report Power Outages and Downed Lines

Customers who have experienced a service interruption due to the storm are encouraged to report their outage if they have not already done so by calling 1-888-LIGHTSS (1-888-544-4877), texting OUT to LIGHTS (544487) or clicking the "Outages" link on [firstenergycorp.com](https://firstenergycorp.com).

FirstEnergy customers can sign up to receive email and text message alert notifications for updates after they've reported a power outage. Customers can also use two-way text messaging to report outages, request updates on restoration efforts and make other inquiries about their electric accounts. More information about these communication tools is available at [firstenergycorp.com/connect](https://firstenergycorp.com/connect).

For updated information on the company's current outages, the company's storm restoration process and tips for staying safe, visit FirstEnergy's 24/7 Power Center at [firstenergycorp.com/outages](https://firstenergycorp.com/outages). To learn more about navigating the recently updated map, please visit [bit.ly/FEoutagemapupdates](https://bit.ly/FEoutagemapupdates).

### Operate Backup Generators Safely

Emergency power generators offer an option for customers needing or wanting uninterrupted service. To ensure the safety of the home's occupants as well as that of electric company employees who may be working on power lines in the area, the proper generator should be selected and installed by a qualified electrician.

When operating a generator, the power coming into the home should always be disconnected. Otherwise, power from the generator could be sent back onto the power lines, creating a hazardous situation for company workers. Locate the generator outside of your home and far away from windows, doors and vents. Never locate a generator inside your home.

View additional [generator safety information](#).

FirstEnergy is dedicated to integrity, safety, reliability and operational excellence. Its electric distribution companies form one of the nation's largest investor-owned electric systems, serving customers in Ohio, Pennsylvania, New Jersey, West Virginia, Maryland and New York. The company's transmission subsidiaries operate approximately 24,000 miles of transmission lines that connect the Midwest and Mid-Atlantic regions. Visit FirstEnergy online at [firstenergycorp.com](https://www.firstenergycorp.com) and follow FirstEnergy and its operating companies on X, formerly known as Twitter, [@FirstEnergyCorp](#), [@ToledoEdison](#), [@IlluminatingCo](#), [@OhioEdison](#), [@MonPowerWV](#), [@JCP&L](#), [@Penn Power](#), [@Penelec](#), [@Met Ed](#), [@PotomacEdison](#), [@W Penn Power](#).

News Media Contact: Hannah Catlett – Ohio Edison, Toledo Edison, The Illuminating Company, (440) 554-5346; Todd Meyers – West Penn Power, Penelec, Met-Ed, Penn Power, (724) 838-6650; Chris Hoenig – JCP&L, (609) 350-8599

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